

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

_____)	
AUTOCAM CORPORATION, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:12-cv-01096-RJJ
)	
SYLVIA M. BURWELL, <i>et al.</i>)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR ENTRY OF PERMANENT INJUNCTION AND JUDGMENT

Pursuant to the Sixth Circuit’s order of December 11, 2014, *see* Order, *Autocam Corp. v. Sebelius*, Nos. 12-2673/13-2316 (6th Cir.),¹ the Parties have conferred and have agreed to language for a permanent injunction and final judgment. Both parties now request that this Court accept this motion for entry of a permanent injunction and judgment.

In light of the Supreme Court’s decision in *Burwell v. Hobby Lobby Stores, Inc.*, 134 S.Ct. 2751 (2014), the parties jointly agree that judgment should be entered in favor of Plaintiff, Autocam Medical LLC (Plaintiff), on its Religious Freedom Restoration Act claim, that a permanent injunction should be entered, that all of the remaining claims should remain dismissed, and that the issue of Plaintiff’s attorney fees and costs will be resolved pursuant to Local Civil Rule 54.1 after judgment is entered. Accordingly, the parties respectfully request that this Court enter the proposed injunction and judgment, which has been agreed to by all parties and is filed concurrently with this motion as an attachment.

¹ The Parties have amended the caption of this filing to reflect that Sylvia M. Burwell is now the Secretary of the United States Department of Health and Human Services and is automatically substituted for former Secretary Kathleen Sebelius. *See* Fed. R. Civ. Proc. 25(d).

Respectfully submitted this 19th day of December, 2014,

/s/ Patrick T. Gillen

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notice of such filing to all parties.

/s/ Patrick T. Gillen
Patrick T. Gillen